

Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STRIKE 3 HOLDINGS, LLC, a Delaware
corporation,

Plaintiff,

v.

JOHN DOE, subscriber assigned IP address
73.225.38.130,

Defendant.

Case No.: 2:17-cv-01731-TSZ

**DECLARATION OF BRYAN CASE IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PROTECTIVE ORDER TO VACATE,
POSTPONE, AND/OR LIMIT
DEPOSITION OF GREG LANSKY**

I, Bryan J. Case, declare as follows:

1. I am over the age of 18 and am otherwise competent to make this declaration. I am one of the attorneys representing Plaintiff Strike 3 Holdings, LLC ("Strike 3") in the above-captioned matter. I offer this declaration in support of Strike 3's Motion for a Protective Order ("Motion"). This declaration is based on my personal knowledge and, if called upon to do so, I could and would testify that the facts stated herein are true and accurate.

2. On February 6, 2019, I conducted a telephonic discovery conference with Defendant's counsel, Mr. J. Curtis Edmonson, regarding Defendant's request to depose Mr. Greg Lansky. I informed Mr. Edmonson that Defendant's proposed deposition of Mr. Lansky was

CASE DECLARATION IN SUPPORT OF MOTION FOR PROTECTIVE
ORDER (2:17-CV-01731-TSZ) - 1

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1 impermissible under the Federal Rules of Civil Procedure and applicable law—as outlined in Strike
2 3’s Motion filed herewith. Mr. Edmonson disagreed. Accordingly, I informed him that Mr. Lansky
3 would not be appearing for his deposition and that Strike 3 would file a motion for protective order.

4 3. I certify, in accordance with Fed.R.Civ. P. 26(c)(1) and Local Civil Rules 26(c)(1)
5 and 37(a)(1), that I conferred with Mr. Edmondson in good faith to resolve this discovery dispute
6 without court action.

7 I declare under penalty of perjury under the laws of the State of Washington and the United
8 States of America that the foregoing is, to the best of my knowledge, true and correct.

9 DATED this 7th day of February, 2019, in Seattle, Washington.

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11 /s/ Bryan J. Case
12 Bryan J. Case
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CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will notify the following persons of such filing:

J. Curtis Edmondson, WSBA #43795
3699 NW John Olsen Place
Hillsboro, OR 97124
Telephone: (503) 336-3749
Email: jcedmondson@edmolaw.com

☒ Via CM/ECF
☐ Via U.S. Mail
☐ Via Messenger Delivery
☐ Via Overnight Courier
☐ Via Facsimile

DATED this 7th day of February , 2019.



Courtney R. Tracy
Legal Administrative Assistant